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Mr. Paul Peronard, U.S. Environmental Protection Agency  
Libby Asbestos Site Team Leader

Ms. Katherine Hernandez, U.S. Environmental Protection Agency  
Remedial Project Manager

Mr. Mark Raney, John A. Volpe Center National Transportation Systems Center  
Task Order Contracting Officer's Technical Representative

Subject: Draft Final Data Gap Analysis for Potential Contaminated Media,  
Railyard and Railways, Operable Unit 6

Dear Mr. Peronard, Ms. Hernandez, and Mr. Raney:

The purpose of this letter is to present data gaps between investigations already conducted and information needed to support a risk assessment and remedial investigation (RI) specific to the Operable Unit (OU) 6. The data gaps were determined by reviewing all existing data for the site as presented in the Data Summary Report (DSR) for OU6 and comparing the data set to the conceptual site model (CSM), Figure 1. It is recommended that the data gaps identified and discussed be addressed as part of completing the risk assessment and RI for OU6.

The CSM for OU6 (Figure 1) identifies several potential exposure pathways resulting in nine contaminated media of concern:

- Outdoor air near structural fire location
- Air in attic or near other unenclosed vermiculite
- Indoor air near breached walls
- Outdoor air near rail lines
- Indoor air (on-site buildings)
- Dust in air of vehicles

- Outdoor air near disturbed soil
- General (ambient) outdoor air
- Dust in air from disturbances of roofing or other outdoor surfaces

This memorandum is organized to identify data gaps by the nine media of concern.

### **Outdoor Air near Structural Fire Location**

Outdoor air near structural fire locations has not been evaluated specific to potential exposures at OU6. It is currently unknown whether the depot building within the railyard contains vermiculite insulation. Attempts to gain access to this building during the 2002 and 2003 Contaminant Screening Study were unsuccessful. Additional attempts should be made to gain access to this building for the purposes of determining if vermiculite insulation is present in this building. If it is determined that vermiculite insulation is not present in this building, this pathway and media of concern can be eliminated from the CSM. If vermiculite insulation is present in this building, exposure to this media of concern is likely and therefore sampling to evaluate this specific media of concern should be considered either specific to OU6 or in conjunction with studies related to other operable units.

### **Air in Attic or near Other Unenclosed Vermiculite**

Air in attics or near other unenclosed areas of vermiculite has not been evaluated specific to potential exposures at OU6. As mentioned above, the presence or absence of vermiculite insulation in the depot building is currently unknown. If it is determined that vermiculite insulation is not present in this building, this pathway and media of concern can be eliminated from the CSM. If vermiculite insulation is present in this building, exposure to this media of concern is likely and therefore sampling to evaluate this specific media of concern should be considered either specific to OU6 or in conjunction with studies related to other operable units.

### **Indoor Air near Breached Walls**

Indoor air near breached walls has not been evaluated specific to potential exposures at OU6. As mentioned above, the presence or absence of vermiculite insulation in the depot building is currently unknown. If it is determined that vermiculite insulation is not present in this building, this pathway and media of concern can be eliminated from the CSM. If vermiculite insulation is present in this building, exposure to this media of concern is likely and therefore sampling to evaluate this specific media of concern should be considered either specific to OU6 or in conjunction with studies related to other operable units.

### **Outdoor Air near Rail Lines**

Outdoor air near rail lines specific to OU6 will be evaluated in a limited capacity with data collected from the processing area ambient air expansion program initiated in July

2007 and completed in July 2008. Additional sample collection may be required for this media of concern for locations in closer proximity to the rail lines outside of the rail yard.

### **Indoor Air (On-Site Buildings)**

Indoor air has not been evaluated specific to potential exposures at OU6. Exposure to this media of concern is likely for workers and travelers using the depot building and other buildings within the OU6; therefore sampling to evaluate this specific media of concern should be considered either specific to OU6 or in conjunction with studies related to other operable units.

### **Dust in Air of Vehicles**

Air in vehicles has not been evaluated specific to potential exposures at OU6. Exposure to this media of concern is likely and therefore sampling to evaluate this specific media of concern should be considered either specific to OU5 or in conjunction with studies related to other operable units.

### **Outdoor Air near Disturbed Soil**

Outdoor air near disturbed soils is a media of concern that has not been evaluated specific to OU6. It is recommended that an OU specific activity-based sampling program be developed to determine potential exposures to commercial workers, tradespersons, and recreational visitors for this OU.

### **General Outdoor Ambient Air**

Information from the current outdoor ambient air program, initiated in October 2006 and completed in October 2008, will fill the data gap for determining outdoor ambient air exposures. Therefore, additional sample collection is not recommended specific to this media of concern.

### **Dust in Air near Disturbances of Roofing or Other Outdoor Surfaces**

Air near disturbances of roofing or other outdoor surface has not been completed specific to OU6. Exposure to this media of concern is likely and therefore sampling to evaluate this specific media of concern should be considered either specific to OU6 or in conjunction with studies related to other operable units.

### **Summary**

The following table summarizes each of the nine media of concern discussed above and indicates if a data gap currently exists specific to OU6 for each media.

Media of Concern	Current Data Sufficient to Determine Exposure (Yes/No)	Additional Sampling Recommended (Yes/No)	Comments
Outdoor air near structural fire location	No	TBD	The presence or absence of vermiculite insulation should be investigated for the depot building before requirements for additional sampling can be determined.
Air in attic or near other unenclosed vermiculite			
Indoor air near breached walls			
Outdoor air near rail lines	No	Yes	
Indoor air (on-site buildings)	No	Yes	
Dust in air of vehicles	No	Yes	
Outdoor air near disturbed soil	No	Yes	
General (ambient) outdoor air	No	No	Outdoor ambient air monitoring program was completed in June of 2008
Dust in air from disturbances of roofing or other outdoor surfaces	No	Yes	

The data gap analysis of OU6 will not be developed further than this version. Any additional data gaps will be identified during the risk assessment, remedial investigation, and/or feasibility study.

If you have any questions or concerns, please feel free to contact me at (720) 264-1121.

Very truly yours,



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